

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Alessandro B. Micozzi	:	Chapter 13
Kristi M. Micozzi	:	Case No.: 21-10629-MDC
Debtor(s)	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtors, Alessandro B. Micozzi & Kristi M. Micozzi, by and through the undersigned counsel, hereby moves this Honorable Court to Modify their Chapter 13 Plan and in support thereof avers as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about March 15, 2021.
2. The Chapter 13 filing was assigned case number 21-10629-MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on July 29, 2021.
4. Debtor has paid \$22,519.00 to the Chapter 13 Trustee to date.
5. On October 26, 2022, Creditor, Wilmington Trust., who services the debtors' mortgage, filed a Motion for Relief from the Automatic Stay.
6. On January 5, 2023, Wilmington Trust and debtors entered into a Stipulation of Settlement allowing the debtors to include the post-petition arrears into a Modified Chapter 13 Plan.
7. The Modified Chapter 13 Plan (attached as Exhibit A) will provide for plan payments in the amount of \$1,389.00 per month for 38 months, for a new base amount of \$75,301.00.

8. The debtor is aware they must remain current on all ongoing post-petition payments owed to Wilmington Trust to avoid any future attempts to modify to the Automatic Stay.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the Stipulation of Settlement of Wells Fargo Bank, N.A.

Dated: February 13, 2023

/s/Brad J. Sadek, Esq
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